

1 **UNITED STATES DISTRICT COURT\nNORTHERN DISTRICT OF CALIFORNIA**

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3 **Hang Zhang,**
4 *Plaintiff,*
5
6 **DANIEL DRISCOLL,**
7 **Secretary, Department of the Army,**
8 *Defendant*
9
10 Case No. 3:25-cv-03381-LJC

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12 (AFL-CIO v. OPM, No. 3:25-cv-01780-
13 WHA)

14 April 28, 2025

15 VIA ECF AND HAND DELIVERY

16 Clerk of Court

17 United States District Court

18 Northern District of California

19 450 Golden Gate Avenue

20 San Francisco, CA 94102

21 Re: Hang Zhang v. Daniel Driscoll, Department of the Army

22 Case No. 3:25-cv-03381-LJC — Administrative Motion to Consider Whether Cases

23 Should Be Related

24 Dear Clerk:

25 Please accept for filing the enclosed documents, which supersede the versions submitted on
26 April 27, 2025. Revisions are limited to caption corrections and consistent exhibit cross-
27 references (Exhibits A–J).

28 Enclosures:

- 29 1. Administrative Motion to Consider Whether Cases Should Be Related (Civ. L.R. 3-12)
- 30 2. [Proposed] Order Relating Cases

- 1 3. Motion for Preliminary Injunction
- 2 4. [Proposed] Order for Preliminary Injunction
- 3 5. Declaration
- 4 6. Consolidated Exhibits
- 5 7. Certificate of Service

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7 Kindly strike the earlier motion or mark it “superseded.”

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9 Respectfully submitted,

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11 /s/ Hang Zhang

12 Hang Zhang | hangzhang777@yahoo.com

13 Defense Language Institute, Department of the Army

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